U.S. Department of the Interior Bureau of Land Management White River Field Office 73544 Hwy 64 Meeker, CO 81641

ENVIRONMENTAL ASSESSMENT

NUMBER: CO-110-2004-195-EA

CASEFILE/PROJECT NUMBER (optional): COD-035705

PROJECT NAME: Piceance Creek Unit T87X-3G, G1, G2, G3, G4

LEGAL DESCRIPTION: T2S R97W Sec 3 SESE

APPLICANT: ExxonMobil

ISSUES AND CONCERNS (optional):

DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES:

Proposed Action: ExxonMobil proposes to drill 5 natural gas wells on a single pad, approximately 13,000 feet deep, in the Piceance Creek Unit. Construction and drilling associated with these wells is scheduled to commence in November 2004 with the last of the 5 wells to be completed sometime in the fall of 2005.

The proposed drill pad is on an existing two track road in a flat, open pinion/juniper/sage site. The drill pad will be approximately 525 feet by 375 feet, (4.5 acres m/l). Approximately one-third of the proposed pad overlaps a reclaimed pad developed for the T-87-3-G well, which was a dry hole. There will be 300 feet of new access road, with a disturbed width of 40 feet (approximately 0.3 acre). A 6-inch natural gas line and 3-inch water disposal line would also be constructed for a length of approximately 3000 feet, along the existing access road. The road would be utilized for construction, and less than 20 feet of additional disturbed width (approximately 1.2 acres) would be anticipated.

Total disturbance would be estimated at 6 acres. APDs have been submitted for 5 wells to be drilled from this pad (T87X-3G, 3G1, 3G2, 3G3, and 3G4). With full development the pad may have as many as 9 well bores, and associated production equipment.

No Action Alternative: No drill pad would be constructed and no wells would be drilled.

ALTERNATIVES CONSIDERED BUT NOT CARRIED FORWARD: None

NEED FOR THE ACTION: ExxonMobil has submitted Applications for Permit to Drill the Piceance Creek Unit T87X-3G, 3G1, 3G2, 3G3, and 3G4 gas wells.

<u>PLAN CONFORMANCE REVIEW</u>: The Proposed Action is subject to and has been reviewed for conformance with the following plan (43 CFR 1610.5, BLM 1617.3):

Name of Plan: White River Record of Decision and Approved Resource Management Plan (ROD/RMP).

Date Approved: July 1, 1997

Decision Number/Page: Page 2-5

<u>Decision Language</u>: "Make federal oil and gas resources available for leasing and development in a manner that provides reasonable protection for other resource values."

<u>AFFECTED ENVIRONMENT / ENVIRONMENTAL CONSEQUENCES /</u> MITIGATION MEASURES:

STANDARDS FOR PUBLIC LAND HEALTH: In January 1997, Colorado Bureau of Land Management (BLM) approved the Standards for Public Land Health. These standards cover upland soils, riparian systems, plant and animal communities, threatened and endangered species, and water quality. Standards describe conditions needed to sustain public land health and relate to all uses of the public lands. Because a standard exists for these five categories, a finding must be made for each of them in an environmental analysis. These findings are located in specific elements listed below:

CRITICAL ELEMENTS

AIR QUALITY

Affected Environment: There are no special designation air sheds or non-attainment areas nearby that would be affected by the proposed action. During periods of low precipitation, air quality in the area of the proposed action is often diminished by dust caused by human disturbance.

Environmental Consequences of the Proposed Action: The proposed action would result in short term, local impacts to air quality during and after construction, due to dust being blown into the air. After adequate vegetation is reestablished, blowing dust should return to preconstruction levels.

Environmental Consequences of the No Action Alternative: No increase in dust will occur.

Mitigation: Require water spreading on the road surfaces to control fugitive dust and to help minimize short-term impacts.

CULTURAL RESOURCES

Affected Environment: The proposed well pad location, access road and well tie pipeline have been inventoried at the Class III (100% pedestrian) level (Metcalf 2004, Compliance Dated 9/02/2004) with no new cultural resources identified in the inventory area.

Environmental Consequences of the Proposed Action: The proposed well pad location, access road and well tie pipeline will not impact any known cultural resources.

Environmental Consequences of the No Action Alternative: There would be no new impacts to cultural resources under the No Action Alternative.

Mitigation: 1. The operator is responsible for informing all persons who are associated with the project operations that they will be subject to prosecution for knowingly disturbing historic or archaeological sites, or for collecting artifacts. If historic or archaeological materials are uncovered during any project or construction activities, the operator is to immediately stop activities in the immediate area of the find that might further disturb such materials, and immediately contact the authorized officer (AO). Within five working days the AO will inform the operator as to:

- whether the materials appear eligible for the National Register of Historic Places
- the mitigation measures the operator will likely have to undertake before the site can be used (assuming in situ preservation is not necessary)
- a timeframe for the AO to complete an expedited review under 36 CFR 800-11 to confirm, through the State Historic Preservation Officer, that the findings of the AO are correct and that mitigation is appropriate.

If the operator wishes, at any time, to relocate activities to avoid the expense of mitigation and/or the delays associated with this process, the AO will assume responsibility for whatever recordation and stabilization of the exposed materials may be required. Otherwise, the operator will be responsible for mitigation cost. The AO will provide technical and procedural guidelines for the conduct of mitigation. Upon verification from the AO that the required mitigation has been completed, the operator will then be allowed to resume construction.

2. Pursuant to 43 CFR 10.4(g) the holder of this authorization must notify the AO, by telephone, with written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4(c) and (d), you must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the authorized officer.

INVASIVE, NON-NATIVE SPECIES

Affected Environment: Noxious weeds known to occur in proximity to the project area include houndstongue, yellow toadflax, bull thistle and mullein. Mullein is present on the reclaimed well pad. The invasive alien cheatgrass is present throughout the project area on areas of earthen disturbance associated with well locations and roads which have not be adequately revegetated.

Environmental Consequences of the Proposed Action: The proposed action will create a large area of earthen disturbance which will provide a safe site for the establishment of noxious weeds and cheatgrass. If the proposed mitigation is applied, there will be no significant impact.

Environmental Consequences of the No Action Alternative: The will be no change from the present situation.

Mitigation: Promptly recontour and revegetate all areas of earthen disturbance with Native Seed mixture #3. Eradicate all noxious or problem weeds and invasive species which occur on site using materials and methods approved in advance by the Authorized Officer.

MIGRATORY BIRDS

Affected Environment: There are a number of migratory birds that fulfill nesting functions in adjacent pinyon-juniper types during the months of May, June, and July, including several species identified as having higher conservation interest by the Rocky Mountain Bird Observatory, Partners in Flight program (i.e., gray flycatcher, black-throated gray warbler). Because these woodlands are composed primarily of regeneration and submature forms with limited cavity availability, the remaining high interest species (i.e., violet-green swallow, juniper titmouse) are not well represented.

Environmental Consequences of the Proposed Action: Construction and drilling associated with these wells is scheduled to commence in November 2004 with the last of the 5 wells to be completed sometime in the fall of 2005. Development activity, initiated well before the breeding season, would be ongoing during the early phases (i.e., pair bond and nest site selection) of the 2005 breeding season. Because activity levels would remain relatively constant through the drilling and completion phases, it is unlikely that species or individuals intolerant of such disruption would site nests in close proximity to such activity. As nest site tenacity increases through the nesting sequence, it is unlikely that birds nesting adjacent to this pad would be subject to elevated levels of nest failure attributable to well development activity. In summary, this project's effect on the reproductive activity of migratory birds would be negligible.

Environmental Consequences of the No Action Alternative: There would be no action authorized that would have potential to disrupt the breeding activities of migratory birds. Alternate actions would have similar or more substantive consequences as those discussed under the proposed action.

Mitigation: None.

THREATENED, ENDANGERED, AND SENSITIVE ANIMAL SPECIES (includes a finding on Standard 4)

Affected Environment: There are no animals listed, proposed, or candidate to the Endangered Species Act, nor animals considered sensitive by the BLM, that are known to inhabit or derive important benefit from the areas potentially influenced by the proposed action.

Environmental Consequences of the Proposed Action: Pad construction and drilling/completion operations would have no conceivable influence on special status species or associated habitat.

Environmental Consequences of the No Action Alternative: There would be no action authorized that would have potential to influence special status species or associated habitats.

Mitigation: None.

Finding on the Public Land Health Standard for Threatened & Endangered species: The proposed and no-action alternatives would have no influence on populations or habitats of animals associated with the Endangered Species Act or BLM sensitive species and, as such, would have no influence on the status of applicable land health standards.

WASTES, HAZARDOUS OR SOLID

Affected Environment: There are no known hazardous or other solid wastes on the subject lands. No hazardous materials are known to have been used, stored or disposed of at sites included in the project area.

Environmental Consequences of the Proposed Action: No listed or extremely hazardous materials in excess of threshold quantities are proposed for use in this project. While commercial preparations of fuels and lubricants proposed for use may contain some hazardous constituents, they would be stored, used and transported in a manner consistent with applicable laws, and the generation of hazardous wastes would not be anticipated. Solid wastes would be properly disposed of.

Environmental Consequences of the No Action Alternative: No hazardous or other solid wastes would be generated under the no-action alternative.

Mitigation: The operator shall be required to collect and properly dispose of any solid wastes generated by the proposed actions.

WATER QUALITY, SURFACE AND GROUND (includes a finding on Standard 5)

Affected Environment: The proposed action has been identified in segment 16 by the State. This segment includes all tributaries to Piceance Creek, including all wetlands, lakes and reservoirs from the source to the confluence with the White River except for specific listings in segments 17-20. (Segments 16a and 16b were combined and renamed segment 16.) A review of the Colorado's 1989 Nonpoint Source Assessment Report (plus updates), the 305(b) report, the 303(d) list and the Unified Watershed Assessment was done to see if any water quality concerns have been identified

The State has classified this segment as a "Use Protected" reach. Its designated beneficial uses are: Warm Aquatic Life 2, Recreation 2, and Agriculture. The antidegredation review requirements in the Antidegredation Rule are not applicable to waters designated use-protected. For those waters, only the protection specified in each reach will apply. For this reach, minimum standards for three parameters have been listed. These parameters are: dissolved oxygen = $5.0 \, \text{mg/l}$, pH = 6.5 - 9.0, Fecal Coliform = $2000/100 \, \text{ml}$, and $630/100 \, \text{ml}$ E. coli. This segment retained its Recreation Class 2 designation after sufficient evidence was received that a Recreation Class 1a use was unattainable.

Environmental Consequences of the Proposed Action: Annual runoff is dynamic and dependent on some aspects we control, such as the amount of vegetation retained for watershed protection and vegetation density. Depleting this vegetation cover needed to protect watersheds from raindrop impact and runoff could cause long-term erosion and water quality problems for Piceance Creek and on downstream. BMPs are needed to re-establish a protective vegetative cover and to collect sediment during runoff events.

Environmental Consequences of the No Action Alternative: Impacts from the no-action alternative are not anticipated.

Mitigation: Apply the following Conditions of Approval, (BMPs) listed in Appendix B, in the White River ROD/RMP to help minimize surface disturbing impacts.

When preparing the site, all suitable topsoil should be stripped from the surface of the location and stockpiled for reclamation. For the interim, if the topsoil is stockpiled on slopes exceeding five percent, construct a berm or trench below the stockpile. Once construction is completed, reclaim as much of the pad that is not needed for maintenance of the well facility.

All sediment control structures or disposal pits will be designed to contain a 100-year, 6-hour storm event. Storage volumes within these structures will have a design life of 25 years.

All activity shall cease when soils or road surfaces become saturated to a depth of three inches unless otherwise approved by the Authorized Officer.

Eliminate undesirable berms that retard normal surface runoff. Fill material associated with construction of this project shall not be deposited in ephemeral draws adjacent to two of these wells.

Finding on the Public Land Health Standard for water quality: The proposed action will have no effect on the watershed's ability to meet these water quality standards.

WETLANDS AND RIPARIAN ZONES (includes a finding on Standard 2)

Affected Environment: The closest channel system supporting riparian vegetation is Piceance Creek, which is separated by about 2 miles of ephemeral channel from the proposed action. This portion of Piceance Creek (and about 11.5 miles downstream) is private and stream function and morphology is heavily modified by irrigation practices (e.g., not strongly represented by obligate forms of riparian vegetation, moderately entrenched/undersized floodplains).

Environmental Consequences of the Proposed Action: This pad is situated on the edge of a relatively broad, gentle-gradient ridge separated from the nearest riparian system by at least 2 miles of ephemeral channel. Pad and road construction would have no direct impact on riparian/wetland resources. With the application of BMPs associated with soil erosion there is no reasonable likelihood that fugitive sediments would have any influence on the function or condition of the Piceance Creek channel or its associated riparian resources.

Environmental Consequences of the No Action Alternative: There would be no action authorized that would have any direct or indirect influence on downstream riparian communities.

Mitigation: None.

Finding on the Public Land Health Standard for riparian systems: Downstream portions of Piceance Creek are private with the nearest BLM-administered reach about 11.5 miles downstream. These private portions of the creek are stable, but due to the factors listed above, are not in proper functioning condition. Neither the proposed or no-action alternative would any effective influence on the function or condition of the Piceance Creek channel, its riparian expression, or its land health status.

CRITICAL ELEMENTS NOT PRESENT OR NOT AFFECTED:

No ACEC's, flood plains, prime and unique farmlands, Wilderness, or Wild and Scenic Rivers, threatened, endangered or sensitive plants exist within the area affected by the proposed action. For threatened, endangered and sensitive plant species Public Land Health Standard is not applicable since neither the proposed nor the no-action alternative would have any influence on populations of, or habitats potentially occupied by, special status plants. There are also no Native American religious or environmental justice concerns associated with the proposed action.

NON-CRITICAL ELEMENTS

The following elements **must** be addressed due to the involvement of Standards for Public Land Health:

SOILS (includes a finding on Standard 1)

Affected Environment: The proposed action is in soil mapping unit number 96 which is a Veatch channery loam, on slopes 12 to 50 percent. This moderately deep, well drained soil is on mountainsides. It formed in colluvium derived dominantly from sedimentary rock. Typically, the surface layer is dark brown channery loam 8 inches thick. The upper 5 inches of the subsoil is dark brown channery loam, and the lower 5 inches is brown channery loam. Included in this unit are small areas of Castner channery loam, Glendive fine sandy loam, Redcreek sandy loam, Rentsac channery loam, and Rhone loam. Also included are small areas of soils that are similar to this Veatch soil but are deep, soils that are more than 35 percent rock fragments, and Rock outcrop. Included areas make up about 15 percent of the total acreage. The percentage varies from one area to another. Permeability of this Veatch soil is moderate. Available water capacity is moderate. Effective rooting depth is 20 to 40 inches. Runoff is medium, and the hazard of water erosion is moderate to very high. It is a Loamy Slopes range site. The proposed action is not in an area designated as CSU-1.

Environmental Consequences of the Proposed Action: General impacts associated with oil and gas and road development include but are not limited to, loss of topsoil, soil compaction and possible increase in sediment loads to the White River. The primary surface-disturbing impact would be a potential increase in sediment transport from runoff events after the protective vegetative cover has been removed. BMPs used to slow runoff, trap sediment and prepare reclaimed areas for seeding would also help reduce soil loss. With an explanation of how these BMPs will be used and implementation of these BMPs, impacts are expected to be short in duration, during the construction phase and for a short time after construction until successful reclamation is achieved.

Environmental Consequences of the No Action Alternative: Impacts are not anticipated from not permitting the proposed action.

Mitigation: Use native seed mix # 3 for the range site identified. In addition, the following COAs from Appendix B, White River ROD/RMP should be applied.

Water bars or dikes shall be constructed on all of the rights-of-way, and across the full width of the disturbed area, as directed by the authorized officer.

Slopes within the disturbed area shall be stabilized by non-vegetative practices designed to hold the soil in place and minimize erosion. Vegetative cover shall be reestablished to increase infiltration and provide additional protection from erosion.

When erosion is anticipated, sediment barriers shall be constructed to slow runoff, allow deposition of sediment, and prevent it from leaving the site. In addition, straining or filtration mechanisms may also contribute to sediment removal from runoff

Finding on the Public Land Health Standard for upland soils: The proposed action will have no effect on the soils' ability to meet the land health standard.

VEGETATION (includes a finding on Standard 3)

Affected Environment: The proposed location (expansion) is to occur within pinyon-juniper woodland on an existing, partially revegetated location.

Environmental Consequences of the Proposed Action: The proposed action will create approximately six acres of earthen disturbance which could provide safe sites for the establishment of noxious and invasive species. These species could invade the surrounding plant communities and thereby threaten the long term health of these plant communities if the proper mitigation isn't applied.

Environmental Consequences of the No Action Alternative: There will be no change from the present situation.

Mitigation: Promptly recontour and revegetate all areas of earthen disturbance with Native Seed mixture #3. Eradicate all noxious or problem weeds and invasive species which occur on site using materials and methods approved in advance by the Authorized Officer.

Finding on the Public Land Health Standard for plant and animal communities (partial, see also Wildlife, Aquatic and Wildlife, Terrestrial): Upland vegetation communities in the project area currently meet the Standard and will continue to in the future if the proposed mitigation is applied.

WILDLIFE, AQUATIC (includes a finding on Standard 3)

Affected Environment: Piceance Creek, separated by about 2 miles of ephemeral channel from the proposed action, is the nearest aquatic habitat. The nearest BLM-administered reach is about 11.5 miles downstream of this point. Stream function and morphology on these downstream reaches are heavily modified by summer-long upstream irrigation practices, but the stream persists in supporting small populations of leopard frog, speckled dace, and flannel-mouthed sucker.

Environmental Consequences of the Proposed Action: This pad is situated on the edge of a relatively broad, gentle-gradient ridge separated from the nearest aquatic system by 2 miles of ephemeral channel. Pad and road construction would have no direct impact on aquatic habitats. With the application of BMPs associated with soil erosion there is no reasonable likelihood that

fugitive sediments would have any influence on the function or condition of the Piceance Creek channel or its associated aquatic values.

Environmental Consequences of the No Action Alternative: There would be no action authorized that would have any direct or indirect influence on downstream aquatic habitat.

Mitigation: None.

Finding on the Public Land Health Standard for plant and animal communities (partial, see also Vegetation and Wildlife, Terrestrial): Downstream portions of Piceance Creek are private with the nearest BLM-administered reach about 11.5 miles downstream. Neither the proposed or no-action alternative would any effective influence on the function or condition of the Piceance Creek channel, its aquatic habitat values, or its land health status.

WILDLIFE, **TERRESTRIAL** (includes a finding on Standard 3)

Affected Environment: The proposed pad encompasses an existing reclaimed well pad and surrounding submature pinyon-juniper woodlands. The location is hemmed-in on all sides by 2 major well-field access roads, a 2-track, and large pipeline right-of-way.

This area is categorized as deer severe winter range that is normally occupied during the late winter and early spring months. However, snow accumulations on these relatively level ridgeline positions typically limit deer use after January and subsequent spring use typically involves April through mid-May. Considering the current distribution and intensity of road access in close proximity to the pad, it is unlikely that this location sustains persistent or high levels of deer use during the periods of occupation.

Non-game wildlife using this area are typical and widely distributed in extensive like habitats across the Resource Area and northwest Colorado; there are no narrowly endemic or highly specialized species known to inhabit those lands potentially influenced by this action. A BLM biologist surveyed this pad and a 500' buffer around the perimeter of pad in mid-July 2004 and found no evidence of current or past raptor nesting activity.

Environmental Consequences of the Proposed Action: The physical conditions and anthropogenic features associated with this pad (bounded on each side by a broad right-of-way clearing or roads) tends to reduce the current utility of the site for winter and spring big game use. Big game would tend to avoid a broader area as affected by intensive pad activity through the 2004-05 season (up to 10 additional acres), but with the attraction of subsequent reclamation, would likely resume present use patterns after well development. The temporary removal of about 6 acres of woodland would result in a negligible reduction in big game forage availability, with the herbaceous component ultimately offset by reclamation. This action is subject to a Condition of Approval that allows activity deferral for up to 60 days during the January through April severe winter period (i.e., a semblance of big game severe winter range stipulation TL-08). This COA is applied in an effort to reduce the effects of human disturbance on big game, including avoidance (habitat disuse) and extraneous energy demands (heightened alert,

locomotion). However, because of aforementioned habitat conditions, including persistent human/vehicle activity associated with and proximity of this pad to 2 major well field access roads, and considering the minimization of surface disturbance and road development attending multiple well pads (see land health finding below), it is recommended that no winter timing limitation be applied to this project.

Similar to the big game discussion above, the conditions at this site also tend to reduce the current utility of the site for nongame bird nesting activity. Additionally, woodland habitats comprised primarily of regeneration and submature forms do not support a strong contingent of obligate woodland species due to suboptimal nest substrate (e.g., relatively simple canopy structure, lack of cavities). The loss of 6 acres of submature woodland habitat (the site likely an historic big sagebrush disclimax) is considered negligible.

Environmental Consequences of the No Action Alternative: There would be no action authorized that would have potential to affect resident wildlife populations or associated habitat.

Mitigation: None.

Finding on the Public Land Health Standard for plant and animal communities (partial, see also Vegetation and Wildlife, Aquatic): On a landscape scale, the project area meets the public land health standards for terrestrial animal communities. Although meeting the land health standard criteria from a physical and biological standpoint, the utility of the specific project site, particularly for big game and nongame birds (including raptors), is adversely influenced by current oil and gas-related facilities (no action alternative). The proposed action is considered an incremental addition to those lands dedicated to mineral development, but would not detract measurably from continued meeting of the land health standard at the landscape scale. Considering the benefits attending multi-well pads in this relatively rugged terrain (i.e., reduced number of pads and extent of associated roads and pipelines), the proposed action tends to reduce the proportion of land dedicated to longer term industrial activities and is thereby consistent with efforts to maintain the land health standards at both coarse and finer landscape scales.

<u>OTHER NON-CRITICAL ELEMENTS</u>: For the following elements, only those brought forward for analysis will be addressed further.

Non-Critical Element	NA or Not	Applicable or Present, No Impact	Applicable & Present and Brought Forward for
	Present		Analysis
Access and Transportation			X
Cadastral Survey	X		
Fire Management		X	
Forest Management	X		
Geology and Minerals			X
Hydrology/Water Rights	X		
Law Enforcement	X		
Paleontology			X

Non-Critical Element	NA or Not	Applicable or Present, No Impact	Applicable & Present and Brought Forward for
	Present		Analysis
Rangeland Management		X	
Realty Authorizations		X	
Recreation			X
Socio-Economics		X	
Visual Resources			X
Wild Horses	X		

ACCESS AND TRANSPORTATION

Affected Environment: The proposed action occurs in an area where motorized vehicles are limited to existing routes and is adjacent to BLM road 1175.

Environmental Consequences of the Proposed Action: The proposed action will not provide any additional access to public lands and will lead to an increase of traffic while the well is being constructed. Following construction, traffic intensity will decrease from construction phase but will still be higher than that prior to construction.

Environmental Consequences of the No Action Alternative: None.

Mitigation: Warning signs should be placed along BLM 1175 making other road users aware of higher than normal traffic volumes which will include very large vehicle traffic. Warning signs will be most important if construction of facilities occurs from mid-August through November during the high use hunting seasons.

GEOLOGY AND MINERALS

Affected Environment: Surface geology of the well pad location is Uinta and ExxonMobil's targeted zone is in the Mesaverde. During drilling water, oil shale, coal, oil and gas resources will be encountered. The pad is located on Federal oil and gas lease COD-035705.

Environmental Consequences of the Proposed Action: During drilling there is the potential for commingling of fresh water aquifers until the casing is cemented. Duration of the open hole will be relatively short and the amount of commingling limited. The proposed cementing procedure of the proposed actions isolates the formations and will prevent the migration of gas, water, and oil between formations. Coal resource will be isolated; however they are at depths that would be too deep to be recovered by conventional methods. Development of these wells will deplete the hydrocarbon resources in the targeted formation.

Environmental Consequences of the No Action Alternative: Maximum economic recovery of the oil and gas resources would not occur.

Mitigation: None

PALEONTOLOGY

Affected Environment: The proposed well pad, access road and well tie location are located in an area mapped as the Uintah Formation (Tweto 1979) which the BLM has categorized as a Condition 1 formation meaning it is know to produce scientifically important fossil resources.

Environmental Consequences of the Proposed Action: If for any reason it becomes necessary to excavate into the underlying bedrock formation to level the well pad, excavate the reserve/blooie pit, construct the road or bury the well tie pipeline there is a potential to adversely impact scientifically important fossil resources

Environmental Consequences of the No Action Alternative: There would be no new impacts to fossil resources under the No Action Alternative.

Mitigation: 1. All exposed rock outcrops in the proposed project area must be examined with a report detailing the results of the inventory and any recommended mitigation, if appropriate, must be submitted to the BLM prior the initiation of construction. 2. If it becomes necessary to excavate into the underlying bedrock at any time during leveling of the well pad, construction of the reserve/blooie pit, building of the road or burying of the pipelines a paleontological monitor shall be present during all such excavations.

RECREATION

Affected Environment: The proposed action occurs within the White River Extensive Recreation Management Area (ERMA). BLM custodially manages the ERMA to provide for unstructured recreation activities such as hunting, dispersed camping, hiking, horseback riding, wildlife viewing and off-highway vehicle use.

The project area has been delineated a Recreation Opportunity Spectrum (ROS) class of Semi-Primitive Motorized (SPM). SPM recreation setting is typically characterized by a natural appearing environment with few administrative controls, low interaction between users but evidence of other users may be present. SPM recreation experience is characterized by a high probability of isolation from the sights and sounds of humans that offers an environment that offers challenge and risk.

Environmental Consequences of the Proposed Action: The public will lose approximately 6 acres of dispersed recreation potential while wells are in operation. The public will most likely not recreate in the vicinity of these facilities and will be dispersed elsewhere. If action coincides with hunting seasons (September through November) it will most likely disrupt the experience sought by those recreationists.

With the introduction of new well pads and roads, an increase of traffic could be expected increasing the likelihood of human interactions, the sights and sounds associated with the human environment and a less naturally appearing environment. Cumulatively, the additional wells and associated facilities will change the ROS class which more resembles Roaded Natural (RN) as opposed to SPM. A RN setting has modifications which range from being easily noticed to strongly dominant to observers within the area as well as a higher frequency of human contacts.

Environmental Consequences of the No Action Alternative: No loss of dispersed recreation potential and no impact to hunting recreationists.

Mitigation: None.

VISUAL RESOURCES

Affected Environment: The proposed action lies within a VRM class III area. The objective of this class is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate. Management activities may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.

Environmental Consequences of the Proposed Action: The proposed action is located on the top of a ridge in a stand of pinyon/juniper trees. The well pad would not be visible from the route (RBC 5) most traveled by a casual observer. By painting all production facilities Juniper Green to mimic and blend with the surrounding vegetation, the level of change to the characteristic landscape would be moderate and the objective of the VRM III classification would be retained.

Environmental Consequences of the No Action Alternative: There would be no additional environmental impacts from the no-action alternative.

Mitigation: All permanent (onsite for six [6] months or longer) structures, facilities and equipment placed onsite shall be painted Munsell Soil Color Chart Juniper Green or equivalent within six months of installation.

CUMULATIVE IMPACTS SUMMARY: The Cumulative impacts of oil and gas developments in this area were analyzed in the White River RMP, based on a reasonable foreseeable development scenario which assumed a total of ten acres per well/pad. This action would involve fewer acres, and the resultant cumulative impacts would be consistent with that analysis.

REFERENCES CITED

Metcalf, Michael D.

A Class III Cultural Resource Inventory for the Proposed Exxon-Mobil PCU T87X-3G Well Pad and Flow Line, Rio Blanco County, Colorado. Metcalf Archaeological Consultants, Inc., Eagle, Colorado.

Tweto, Ogden

1979 Geologic Map of Colorado. United States Geologic Survey, Department of the Interior, Reston, Virginia.

PERSONS / AGENCIES CONSULTED: None

INTERDISCIPLINARY REVIEW:

Name	Title	Area of Responsibility
Caroline Hollowed	P & EC	Air Quality
Tamara Meagley	NRS	Areas of Critical Environmental Concern
Tamara Meagley	NRS	Threatened and Endangered Plant Species
Michael Selle	Archaeologist	Cultural Resources Paleontological Resources
Mark Hafkenschiel	Rangeland Management Specialist	Invasive, Non-Native Species
Ed Hollowed	Wildlife Biologist	Migratory Birds
Ed Hollowed	Wildlife Biologist	Threatened, Endangered and Sensitive Animal Species, Wildlife
Bo Brown	Hazmat Collateral	Wastes, Hazardous or Solid
Caroline Hollowed	P & EC	Water Quality, Surface and Ground Hydrology and Water Rights
Ed Hollowed	Wildlife Biologist	Wetlands and Riparian Zones
Chris Ham	ORP	Wilderness
Caroline Hollowed	P & EC	Soils
Mark Hafkenschiel	Rangeland Management Specialist	Vegetation
Ed Hollowed	Wildlife Biologist	Wildlife Terrestrial and Aquatic
Chris Ham	ORP	Access and Transportation
Ken Holsinger	NRS	Fire Management
Robert Fowler	Forester	Forest Management
Paul Daggett	Mining Engineer	Geology and Minerals
Mark Hafkenschiel	Rangeland Management Specialist	Rangeland Management
Penny Brown	Realty Specialist	Realty Authorizations
Chris Ham	ORP	Recreation
Keith Whitaker	NRS	Visual Resources
Valerie Dobrich	NRS	Wild Horses

Finding of No Significant Impact/Decision Record (FONSI/DR)

CO-110-2004-195-EA

<u>FINDING OF NO SIGNIFICANT IMPACT (FONSI)/RATIONALE</u>: The environmental assessment and analyzing the environmental effects of the proposed action have been reviewed. The approved mitigation measures (listed below) result in a <u>Finding of No Significant Impact</u> on the human environment. Therefore, an environmental impact statement is not necessary to further analyze the environmental effects of the proposed action.

<u>**DECISION/RATIONALE**</u>: It is my decision to approve the Applications for Permit to Drill in the Piceance Creek Unit T87X-3G, 3G1, 3G2, 3G3, and 3G4 wells with the mitigation listed below.

MITIGATION MEASURES:

Require water spreading on the road surfaces to control fugitive dust and to help minimize short-term impacts.

The operator is responsible for informing all persons who are associated with the project operations that they will be subject to prosecution for knowingly disturbing historic or archaeological sites, or for collecting artifacts. If historic or archaeological materials are uncovered during any project or construction activities, the operator is to immediately stop activities in the immediate area of the find that might further disturb such materials, and immediately contact the authorized officer (AO). Within five working days the AO will inform the operator as to:

- whether the materials appear eligible for the National Register of Historic Places
- the mitigation measures the operator will likely have to undertake before the site can be used (assuming in situ preservation is not necessary)
- a timeframe for the AO to complete an expedited review under 36 CFR 800-11 to confirm, through the State Historic Preservation Officer, that the findings of the AO are correct and that mitigation is appropriate.

If the operator wishes, at any time, to relocate activities to avoid the expense of mitigation and/or the delays associated with this process, the AO will assume responsibility for whatever recordation and stabilization of the exposed materials may be required. Otherwise, the operator will be responsible for mitigation cost. The AO will provide technical and procedural guidelines for the conduct of mitigation. Upon verification from the AO that the required mitigation has been completed, the operator will then be allowed to resume construction.

Pursuant to 43 CFR 10.4(g) the holder of this authorization must notify the AO, by telephone, with written confirmation, immediately upon the discovery of human remains, funerary items,

sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4(c) and (d), you must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the authorized officer.

Promptly recontour and revegetate all areas of earthen disturbance with the following seed mixture:

SPECIES (VARIETY)	LBS. PLS/ACRE
Western wheatgrass (Rosanna)	2
Bluebunch wheatgrass (Secar)	2
Thickspike wheatgrass (Critana)	2
Indian ricegrass (Nezpar)	1
Fourwing saltbush (Wytana)	1
Utah sweetvetch	1

Alternates: Needle and thread, globemallow

Eradicate all noxious or problem weeds and invasive species which occur on site using materials and methods approved in advance by the Authorized Officer.

The operator shall be required to collect and properly dispose of any solid wastes generated by the proposed actions.

When preparing the site, all suitable topsoil should be stripped from the surface of the location and stockpiled for reclamation. For the interim, if the topsoil is stockpiled on slopes exceeding five percent, construct a berm or trench below the stockpile. Once construction is completed, reclaim as much of the pad that is not needed for maintenance of the well facility.

All sediment control structures or disposal pits will be designed to contain a 100-year, 6-hour storm event. Storage volumes within these structures will have a design life of 25 years.

All activity shall cease when soils or road surfaces become saturated to a depth of three inches unless otherwise approved by the Authorized Officer.

Provide vegetative or artificial stabilization of cut and fill slopes in the design process. Avoid establishment of vegetation where it inhibits drainage from the road surface or where it restricts safety or maintenance.

Eliminate undesirable berms that retard normal surface runoff. Fill material associated with construction of this project shall not be deposited in ephemeral draws adjacent to two of these wells.

Water bars or dikes shall be constructed on all of the rights-of-way, and across the full width of the disturbed area, as directed by the authorized officer.

Slopes within the disturbed area shall be stabilized by non-vegetative practices designed to hold the soil in place and minimize erosion. Vegetative cover shall be reestablished to increase infiltration and provide additional protection from erosion.

When erosion is anticipated, sediment barriers shall be constructed to slow runoff, allow deposition of sediment, and prevent it from leaving the site. In addition, straining or filtration mechanisms may also contribute to sediment removal from runoff

Warning signs should be placed along BLM 1175 making other road users aware of higher than normal traffic volumes which will include very large vehicle traffic. Warning signs will be most important if construction of facilities occurs from mid-August through November during the high use hunting seasons.

All exposed rock outcrops in the proposed project area must be examined with a report detailing the results of the inventory and any recommended mitigation, if appropriate, must be submitted to the BLM prior the initiation of construction.

If it becomes necessary to excavate into the underlying bedrock at any time during leveling of the well pad, construction of the reserve/blooie pit, building of the road or burying of the pipelines a paleontological monitor shall be present during all such excavations.

All permanent (onsite for six [6] months or longer) structures, facilities and equipment placed onsite shall be painted Munsell Soil Color Chart Juniper Green or equivalent within six months of installation.

COMPLIANCE/MONITORING:

NAME OF PREPARER: Vern Rholl

NAME OF ENVIRONMENTAL COORDINATOR: Carol Hollowed

SIGNATURE OF AUTHORIZED OFFICIAL: Sor Field Manager

DATE SIGNED: 11/5/64

ATTACHMENTS: Location map of the proposed action.

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